

***UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO***

IN RE: THE HORNED DORSET PRIMAVERA INC. Debtor

CASE NO: 15-03837 (ESL)

CHAPTER: 11

STIPULATION

TO THE HONORABLE COURT:

COME NOW Debtor and the Puerto Rico Electric Power Authority (PREPA), creditor in the instant case, each represented by its respective counsel and respectfully state and pray as follows:

1. On July 17, 2015 Debtor moved for modification by the Court of the adequate assurance deposit requested by the Puerto Rico Electric Power Authority (Docket 36). PREPA filed an opposition to Debtor's request on August 15, 2015 (Docket 45). The matter was discussed at the September 22, 2015 hearing, and at the parties' request, the Court granted a 21 days period for a settlement agreement to be reached and formally filed.

2. Debtor and PREPA have in fact reached an agreement regarding the adequate

Stipulation

2

The Horned Dorset Primavera Inc.
15-03837 ESL11

assurance deposit for electric power services at Debtor's premises under account number 2168911000.

3. Debtor will make a \$40,000.00 payment to PREPA for adequate assurance purposes, under the following terms: a \$10,000.00 payment on or before November 24, 2015, and six monthly instalments of \$5,000.00 each. (copy of the check is attached as exhibit A)

4. Debtor will keep the account current on post-petition monthly charges.

5. The parties' request that the court filings under Docket Numbers 36, 45, 49, 57and 83 be deemed as moot, in light of this agreement.

WHEREFORE, it is respectfully requested from this Court to that it be appraised of the terms of the parties' agreement, as spelled out in this document, and that court filings under Docket Numbers 36, 45, 49, 57and 83 be deemed as moot.

I HEREBY CERTIFY: That on this date, we electronically filed the foregoing motion with the CLERK OF THE COURT using the CM/ECF system that will notify the U. S. TRUSTEE, Debtor's Attorney and all CM/ECF participants.

In San Juan, Puerto Rico, this 24th day of November, 2015.

/s/ JOSE R. CINTRON RODRIGUEZ
JOSE R. CINTRON RODRIGUEZ, Esq.
USDC-PR 204905
Litigation Division PREPA
PO Box 363928
San Juan, PR 00936-3928
Phone: (787) 521-4448
Fax: (787) 521-4440
j-cintron-djur@prepa.com

S/Isabel M. Fullana

GARCIA-ARREGUI & FULLANA PSC
Citibank Tower/Suite 1101
252 Ponce de León Ave.
Hato Rey PR 00918
Tel: (787) 766-2530
Fax: (787) 756-7800
E-mail: isabelfullana@gmail.com
ifullana@garciaarreguifullanlaw.com

Purchaser: THE HORNED DORSET PRIMAVERA HOTEL

Payee: AUTORIDAD ENERGIA ELECTRICA

MEMO #1831612969 15-0383

Branch: 035

Teller: 09411

Source:

Amount: \$10,000.00

Fee: \$8.00

Total: \$10,008.00

THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM

1 First Bank

Manager's Check

Check No. 989814

101-7147/2215

Purchaser: THE HORNED DORSET PRIMAVERA HOTEL

Date: 11/24/2015

Pay ***Ten Thousand Dollars*****

To The Order of: AUTORIDAD ENERGIA ELECTRICA

MEMO #1831612969 15-0383

\$10,000.00
DOLLAR ONE ZERO CUMMA ZERO ZERO ZERO PERIOD ZERO ZERO

Valid for Six Months After Issuance

Branch 035 **Teller No.**

FDIC DRAWN ON FIRSTBANK
SAN JUAN, PUERTO RICO

[Signature] 1263

YYNS-5001-0911R

⑈989814⑈ ⑆221571473⑆ 35⑈3000017⑈

40